

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

UNITED STATES OF AMERICA

V.

CRIMINAL COMPLAINT

BRANDON JONES

Permanent Case No: 15-cr-20299-SHM-rgc

Temporary Case No: _____

I, David E. Palmer, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief.

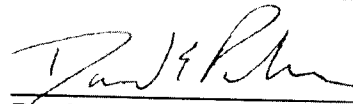
On or about November 24, 2015, and continuing until at least November 29, 2015, in the Western District of Tennessee, the defendant, Brandon Jones, violated Title 18, United States Code, Section 1591; sex trafficking of children, or by force, fraud, or coercion.

I further state that I am a Special Agent with the Federal Bureau of Investigation and that this complaint is based on the following facts:

(SEE AFFIDAVIT OF SPECIAL AGENT DAVID E. PALMER WHICH IS ATTACHED HERETO AND FULLY INCORPORATED HEREIN BY REFERENCE)

Continued on the attached sheet and made a part hereof X Yes ___ No

12/17/2015
Date



David E. Palmer - AFFIANT
Special Agent,
Federal Bureau of Investigation

TMP
Pursuant to Federal Rule of Criminal Procedure 4.1, the undersigned judicial officer has on this date considered information communicated by ☒ telephone or ☐ other reliable electronic means or ☒ both, in reviewing a complaint and/or deciding whether to issue a warrant or summons. In doing so, this judicial officer has placed the affiant under oath and has confirmed by speaking personally with the affiant on the telephone ☒ that the signatures on the complaint and affidavit are those of the affiant or ☐ that the affiant has authorized the placement of the affiant's signatures on the complaint and affidavit, the documents received by the judicial officer are a correct and complete copy of the documents submitted by the affiant, and the information contained in the complaint and affidavit are true and correct to the best of the affiant's knowledge.

Sworn to and subscribed before me by telephone this 17 day of December, 2015.

s/ Tu M. Pham

TU M. PHAM

UNITED STATES MAGISTRATE JUDGE

AFFIDAVIT OF SPECIAL AGENT DAVID E. PALMER

I, **David E. Palmer**, being first duly sworn, hereby depose and state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been since January 11, 2015. I am currently assigned to the FBI Field Office in Memphis, Tennessee. I have received training in criminal investigations and in investigating and prosecuting human trafficking and sexual exploitation of minors.
2. Your Affiant is conducting an investigation into certain activities of the subject, Brandon Jones aka Poohmane, in violation of Title 18, United States Code, Section 1591, Sex Trafficking of Children or by Force, Fraud or Coercion, and other related offenses, including Title 18, United States Code, Section 1594, subsection c, Conspiracy to Commit Sex Trafficking of Children or by Force, Fraud or Coercion, and Title 18, United States Code, Section 1952, use of a facility of interstate commerce to promote, manage, establish, carry on, and facilitate a business enterprise involving prostitution offenses in violation of the laws of Tennessee and the laws of the United States.
3. The following information was obtained through observations and conversations of your Affiant personally, through the assistance of other law enforcement agents and agencies, including their reports, and through other sources specifically named in this affidavit. Since this affidavit is being submitted for the limited purpose of securing an arrest warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that Brandon Jones has committed violations of Title 18, U.S.C. Section 1591.
4. On November 24, 2015, FBI Memphis Division received information from FBI Little Rock Division that a juvenile, 16 years of age, hereafter referred to as CT, from Memphis, TN

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was recovered after she was stopped in a stolen vehicle with Darrel Greenwood, a wanted fugitive from Shelby County, TN. According to CT, she was prostituted in Memphis, TN and Texarkana, AR, as part of a "two girl special" with an 18 year old female, hereafter referred to as SR, also known as "Ke Ke".

5. On November 30, 2015, CT was interviewed at the Children's Advocacy Center in Texarkana, TX in the presence of an FBI Little Rock agent. During her interview, CT provided the following information:
6. SR is currently being prostituted by a pimp in Memphis, TN known to CT as Poohmane (later identified as Brandon Jones). Jones is also prostituting a juvenile female known to CT as "Jelly" and "Madison" (later identified as JW) whom CT states has been assaulted by Jones.
7. On December 1, 2015, an FBI Memphis undercover agent contacted 901-289-9493, the telephone number listed on a backpage.com advertisement for "Madison&Keke" advertising a "2 girl special." Agents arranged a date with the female who answered the phone number listed on the advertisement. When the females arrived to the date, they were transported by Brandon Jones. The females were identified as SR and a 16 year old juvenile JW.
8. JW was interviewed following the FBI operation and stated that she had been prostituted for several months on backpage.com with SR and other females. According to JW, she was recently prostituted in Tuscaloosa, Alabama but did not make very much money so Brandon Jones transported her back to Memphis.
9. Brandon Jones was detained during the FBI operation and an iPhone4, model number A1349, which was on his person was seized. While he was detained, Jones told Agents his cell phone number was 901-318-9913.

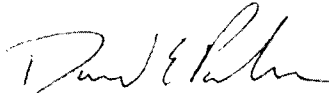
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10. During the FBI operation SR was found in the possession of a cell phone, and consented to a search of her phone. After reviewing her phone contents, agents located text messages between telephone number 901-318-9913 and SR. SR had 901-318-9913 listed as "poohmane" in her phone contacts. In various text messages between Jones and SR on November 29, 2015, Jones sent SR a text stating "hold up baby, I'm posting you". Jones then requested two pictures of "her". In response, SR sent three pictures of of JW, the 16 year old juvenile. SR also sent Jones pictures of various ads of SR and JW posted on Backpage.com
11. On December 14, 2015, a State of Tennessee search warrant was obtained in Shelby County, TN for the cell phone seized from Brandon Jones during the FBI operation. Your affiant's review of the cell phone, bearing telephone number 901-318-9913, showed that Jones was in continual contact with telephone number 901-289-9493, the telephone number used by SR, by voice calls and text message. On November 29, 2015, Jones sent SR a text message stating "Hold up baby I'm posting you", then later a text message stating "Post baby", to which she responded kk. The cell phone also contained an email account, mac74poohmane@yahoo.com, which showed that on November 29, 2015, Jones posted nine advertisements on backpage.com, a known prostitution website, and used the email account to confirm the postings.
12. On December 16, 2015, your affiant received and reviewed the results of a subpoena to backpage.com for all advertisements related to email address mac74poohmane@yahoo.com. Your affiants review of the subpoena response showed that on November 29, 2015, multiple advertisements were created including one titled "Juicy lips ready for u -22" and containing the text "Hey I'm horny and very freaky just need you too come to me so we can have a good time Must be ready when call". The advertisement contained 3 pictures of JW, the 16 year old juvenile.

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13. In consideration of the foregoing, your Affiant respectfully requests that this Court issue and arrest warrant for Brandon Jones, for the violation of Title 18, United States Code, Section 1591.

AND FURTHER, AFFIANT SAITH NOT.



David E. Palmer - AFFIANT
Special Agent,
Federal Bureau of Investigation

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Sworn to and subscribed before me by telephone this 17 day of December, 2015.

December 17, 2015
DATE

s/ Tu M. Pham
TU M. PHAM
UNITED STATES MAGISTRATE JUDGE

TMP
12/17/2015